

1 **EPAP**
AARON D. FORD
2 Attorney General
VIVIENNE RAKOWSKY (Bar No. 9160)
3 Deputy Attorney General
BRANDEE MOONEYHAN (Bar No. 7451)
4 Deputy Attorney General
State of Nevada
5 Office of the Attorney General
100 North Carson Street
6 Carson City, NV 89701
(775) 684-1208 (phone)
7 (775) 684-1145 (fax)
BMooneyhan@ag.nv.gov

8 *Attorneys for Plaintiff*

9
10 **DISTRICT COURT OF NEVADA**

11 **COUNTY OF CLARK**

12 BARBARA CEGAVSKE, Nevada
Secretary of State,

13
14 Plaintiff,

15 vs.

16 CHRISTIAN GRONAU, an Individual,
and ABRA-CADABRA WELDING, INC.,
17 a Nevada corporation,

18 Defendants.

Case No. A-20-807906-C

Dept. No. 6

19 **PLAINTIFF'S EX-PARTE APPLICATION FOR COURT TO REOPEN CASE**

20 Plaintiff Barbara Cegavske, in her official capacity as Nevada's Secretary of State,
21 through counsel, Aaron D. Ford, Attorney General, and Brandee Mooneyhan, Deputy
22 Attorney General, respectfully applies for the Court to reopen this case so that it may
23 address the merits of Plaintiff's motion filed May 4, 2020.

24 On May 4, 2020, Plaintiff filed an "Ex-Parte Motion to (1) Extend Time to Serve
25 Process; and (2) Allow Service of Process by Publication," based on Defendant Christian
26 Gronau's apparent evasion of service. The next activity in the case was on February 9,
27 2021, when the Court entered a "Civil Order to Statistically Close Case," noting that the
28 case was involuntarily dismissed pursuant to EDCR 1.90. It appears the case was closed

1 without addressing the pending motion because no proposed order regarding the motion
2 was submitted to the Court. Counsel was unaware that a proposed order should be
3 submitted before the Court ruled on the motion and sincerely apologizes for the oversight.
4 Because it appears Defendants continue to engage in the conduct set forth in the complaint,
5 namely, conducting business without a state business license, Plaintiff would like to pursue
6 this matter, and urges that the pending motion should be resolved on its merits, rather
7 than the case being closed based on a procedural error. Counsel has now prepared a
8 proposed order regarding the May 4, 2020, motion and it will be submitted promptly if this
9 Court reopens this matter.

10 Pursuant to NRS 239B.030, the undersigned does hereby affirm that the foregoing
11 document does not contain the social security number of any person.

12 DATED this 16th day of April 2021.

13 AARON D. FORD
14 Attorney General

15 By: /s/ Brandee Mooneyhan
16 VIVIENNE RAKOWSKY (Bar No. 9160)
17 Deputy Attorney General
18 BRANDEE MOONEYHAN (Bar No. 7451)
19 Deputy Attorney General

20 *Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

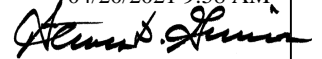
2 I certify that I am an employee of the Office of the Attorney General, State of Nevada
3 and that on April 16, 2021, I filed **PLAINTIFF’S EX-PARTE APPLICATION FOR**
4 **COURT TO REOPEN CASE** via this Court’s electronic filing system. Parties that are
5 registered with this Court’s EFS will be served electronically. The following parties are
6 not registered and therefore, a copy of this document has been placed in the United States
7 Mail, first-class postage prepaid.

8 Christian Gronau
9 6205 Burnt Hills Dr.
Las Vegas, NV 89130

10 Abra-Cadabra Welding, Inc.
11 Attn: Susanna Gronau
12 6205 Burnt Hills Dr.
Las Vegas, NV 89130

13 Christian Gronau
14 6635 Boulder Hwy. #167
Las Vegas, NV 89122

15
16 /s/ C. Salerno
17 An employee of the office of
18 the Nevada Attorney General
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CLERK OF THE COURT

1 **ORDG**
 2 **AARON D. FORD**
 3 Attorney General
 4 **VIVIENNE RAKOWSKY** (Bar No. 9160)
 5 Deputy Attorney General
 6 **BRANDEE MOONEYHAN** (Bar No. 7451)
 7 Deputy Attorney General
 8 State of Nevada
 9 Office of the Attorney General
 10 100 North Carson Street
 11 Carson City, NV 89701
 12 (775) 684-1208 (phone)
 13 (775) 684-1145 (fax)
 14 BMooneyhan@ag.nv.gov

Attorneys for Plaintiff

DISTRICT COURT OF NEVADA

COUNTY OF CLARK

12 **BARBARA CEGAVSKE**, Nevada
13 Secretary of State,

Plaintiff,

15 vs.

16 **CHRISTIAN GRONAU**, an Individual,
17 and **ABRA-CADABRA WELDING, INC.**,
a Nevada corporation,

Defendants.

Case No. A-20-807906-C

Dept. No. 6

**ORDER GRANTING PLAINTIFF'S EX PARTE APPLICATION
FOR COURT TO REOPEN CASE**

21 The Court has reviewed Plaintiff's Ex Parte Application for Court to Reopen Case
22 and, cause appearing, grants the application. The clerk shall reopen this case forthwith.

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1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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5
6 Nevada Secretary of State,
Plaintiff(s)

CASE NO: A-20-807906-C

7 vs.

DEPT. NO. Department 6

8
9 Christian Gronau, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order Granting was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 4/20/2021

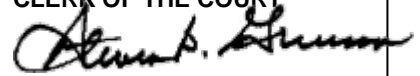
15 Vivienne Rakowsky

vrakowsky@ag.nv.gov

16 Michele Caro

mcaro@ag.nv.gov

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1 **NEO**
2 **AARON D. FORD**
3 Nevada Attorney General
4 **VIVIENNE RAKOWSKY**
5 Deputy Attorney General
6 Nevada Bar No. 6103
7 555 East Washington Ave.,
8 Las Vegas, NV 89101
9 vrakowsky@ag.nv.gov
10 *Attorneys for Plaintiff*

8 **EIGHTH JUDICIAL DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

11 **BARBARA CEGAVSKE, Nevada**) Case No. A-20-807906-C
12 **Secretary of State,**)
13 **Plaintiff,**) Department No.: 6
14 **vs.**)
15 **CHRISTIAN GRONAU, an Individual,**)
16 **and ABRA-CADABRA WELDING, INC.,**)
17 **a Nevada Corporation,**)
18 **Defendants.**)

18 **NOTICE OF ENTRY OF ORDER GRANTING PLAINTIFF'S EX PARTE**
19 **MOTION TO REOPEN THIS CASE**

20 PLEASE TAKE NOTICE that an ORDER GRANTING PLAINTIFF'S EX PARTE
21 MOTION TO REOPEN THE CASE was filed in the above-entitled action on the 20th day
22 of April, 2021, a copy of which is attached hereto.

23 DATED this 28th day of April, 2021.

24 **AARON D. FORD**
25 **Attorney General**

26 By: /s/ VIVIENNE RAKOWSKY
27 **VIVIENNE RAKOWSKY**
28 **Deputy Attorney General**

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of the Office of the Attorney General and
3 that on the 28th day of April, 2021, I filed the foregoing ***NOTICE OF ENTRY OF***
4 ***ORDER GRANTING PLAINTIFF'S EX PARTE MOTION TO REOPEN CASE*** via
5 this Court's electronic filing system. Parties that are registered with this Court's EFS
6 will be served electronically.

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10 /s/ Michele Caro
11 An Employee of the Office of the Attorney General
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1 **ORDG**
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6 Carson City, NV 89701
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8
Attorneys for Plaintiff
9

10 **DISTRICT COURT OF NEVADA**
11 **COUNTY OF CLARK**

<p>12 BARBARA CEGAVSKE, Nevada Secretary of State, 13 14 Plaintiff, 15 vs. 16 CHRISTIAN GRONAU, an Individual, and ABRA-CADABRA WELDING, INC., 17 a Nevada corporation, 18 Defendants.</p>	<p>Case No. A-20-807906-C Dept. No. 6</p>
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19 **ORDER GRANTING PLAINTIFF'S EX PARTE APPLICATION**
20 **FOR COURT TO REOPEN CASE**

21 The Court has reviewed Plaintiff's Ex Parte Application for Court to Reopen Case
22 and, cause appearing, grants the application. The clerk shall reopen this case forthwith.

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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Nevada Secretary of State,
7 Plaintiff(s)

CASE NO: A-20-807906-C

8 vs.

DEPT. NO. Department 6

9 Christian Gronau, Defendant(s)

10
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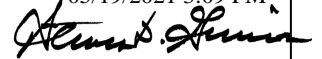
16 Vivienne Rakowsky

vrakowsky@ag.nv.gov

17 Michele Caro

mcaro@ag.nv.gov

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CLERK OF THE COURT

1 **OGM**
2 AARON D. FORD
3 Nevada Attorney General
4 VIVIENNE RAKOWSKY
5 Deputy Attorney General
6 Nevada Bar No. 9160
7 555 East Washington Ave.,
8 Las Vegas, NV 89101
9 Telephone: (702) 486-3420
0 Facsimile: (702) 486-3416
1 vrakowsky@ag.nv.gov

2 *Attorneys for Plaintiff*

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9
10 **DISTRICT COURT OF NEVADA**
11 **COUNTY OF CLARK**

12 BARBARA CEGAVSKE, Nevada
13 Secretary of State,

14 Plaintiff,

15 vs.

16 CHRISTIAN GRONAU, an Individual,
17 and ABRA-CADABRA WELDING, INC.,
18 a Nevada corporation,

19 Defendants.

Case No. A-20-807906-C

Dept. No. VI

20 **ORDER GRANTING PLAINTIFF'S EX-PARTE MOTION TO**
21 **(1) EXTEND TIME TO SERVE PROCESS; and**
22 **(2) ALLOW SERVICE OF PROCESS BY PUBLICATION**

23 On May 4, 2020, Plaintiff filed a motion to extend the time to effect service upon
24 Defendants in this matter and to effect such service by publication.

25 Plaintiff has shown good cause to extend the time to effectuate service of process in
26 this matter. NRCP 4(e)(3); *Scrimmer v. Eighth Judicial Dist. Court*, 116 Nev. 507, 513, 998
27 P.2d 1190, 1193-94 (2000).

28 Further, Plaintiff has demonstrated that serving Defendants in this matter by
publication is warranted. *See* NRCP 4.4(c).

///

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Nevada Secretary of State,
7 Plaintiff(s)

CASE NO: A-20-807906-C

8 vs.

DEPT. NO. Department 6

9 Christian Gronau, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order Granting Motion was served via the court's electronic eFile
14 system to all recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 5/19/2021

16 Vivienne Rakowsky

vrakowsky@ag.nv.gov

17 Michele Caro

mcaro@ag.nv.gov

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